

United States Bankruptcy Court
Eastern District of Virginia
Alexandria Division

In RE:

Christopher Leitch, a/k/a Chris Leitch
Debtor

Address: 4655 Whitaker Place, Woodbridge, VA 22193
Last four digits of Social Security No.(s): XXX-XX-3063

BCN #: 21-11601-KHK
Chapter: 13

**RESPONSE TO DEBTOR'S MOTION TO APPROVE PROPOSED LOAN
MODIFICATION AGREEMENT**

Comes now Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor"), by Counsel, and for its response to the Debtor's Motion for Authority to Modify Existing Debt states as follows:

1. That Creditor holds a first priority deed of trust secured by real property located at 14068 Randolph Court, Woodbridge, VA 22193 and has entered into a Loan Modification Agreement, subject to approval by the Court.
2. That Creditor consents to the motion as long as the order approving the motion contains the correct terms per the Creditor's agreement with the Debtors.
3. Creditor notes that the Motion sets forth the prior principal balance as \$246,088.10, but that is the amount listed on the Creditor's Proof of Claim filed on October 21, 2021 as the total debt at the time of the filing of the petition. The principal balance as of the date of the petition, as set forth in the Proof of Claim, was \$233,508.65.
3. Nothing contained herein shall prevent the Secured Creditor from proceeding to foreclosure upon obtaining relief from the Automatic Stay.

Dated: February 9, 2022

LOGS LEGAL GROUP LLP

Attorneys for Nationstar Mortgage LLC
d/b/a Mr. Cooper

/s/ Mary F. Balthasar Lake

By: _____
Malcolm B. Savage, III, Esquire
VSB #91050
William M. Savage, Esquire
VSB #26155
Mary F. Balthasar Lake, Esquire
VSB #34899
Gregory N. Britto, Esquire
VSB #23476
Randa Azzam, Esquire
VSB #31539
Counsel for Movant

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of February 2022 the following person(s) were served a copy of the foregoing in the manner described below:

Via CM/ECF Electronic Notice:

Martin C Conway, Conway Law Group, PC
12934 Harbor Drive
Suite 107
Woodbridge, VA 22192

Debtor's Attorney

Thomas P. Gorman
300 N. Washington St. Ste. 400
Alexandria, VA 22314

Chapter 13 Trustee

Via First Class Mail, Postage Prepaid:

Christopher Leitch a/k/a Chris Leitch
4655 Whitaker Place
Woodbridge, VA 22193

Debtor(s)

/s/ Mary F. Balthasar Lake

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